

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

BARBARA FERGUSON

v.

PATHMARK STORES, INC., ET AL.

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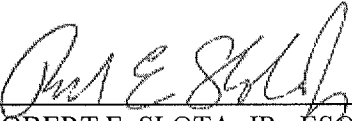
Civil Action No.: 13-00778

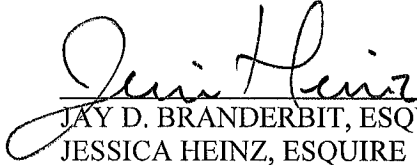
JOINT DISCOVERY PLAN

In accordance with Fed. R. Civ. P. 26(f) and this Court's Notice dated February 26, 2013 setting March 18, 2013 as the date for the Court's pretrial conference pursuant to Fed. R. Civ. P. 16(b), the parties have conferred and developed a joint discovery plan. Accordingly, the parties hereby submit the following joint discovery plan.

1. The parties will exchange Fed. R. Civ. P. 26(a)(1) disclosures on or before March 18, 2013.
2. All discovery will be completed on or before June 10, 2013.
3. The parties have not reached any agreement on the disclosure or discovery of electronically-stored information, but reserve the right to do so, should the same become necessary.
4. The parties have not reached any agreement on the timing or form for the assertion of claims of privilege or protection of trial preparation materials, but reserve the right to do so, should the same become necessary.
5. Plaintiff's expert reports are due on or before July 10, 2013.
6. Defendant's expert reports are due on or before August 12, 2013.
7. Any dispositive motions that will be filed in this matter are to be filed on or before August 31, 2013.

8. The parties will be ready to proceed to trial on September 23, 2013, subject to the Court's resolution of any dispositive motions.


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DATED: March 4, 2012

APPROVED AND SO ORDERED THIS ____ DAY OF MARCH, 2013

PADOVA, J.